



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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Salt Lake City, Utah 84180-1203

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November 22, 1991

Mr. Roy Benson
Geneva Steel
P. O. Box 2500
Provo, Utah 84603

Dear Mr. Benson:

Re: Permit Transfers, M/021/001, and M/021/005, Ull & Comstock Mines, Iron County, Utah

The Division recently approved Geneva Steel's (Geneva) interim reclamation surety for the entire Iron Mountain site. The approval covers those areas acquired by Geneva from Utah International Inc. (Ull) and CF&I Steel Corporation (CF&I) under permits M/021/001 and M/021/005, respectively.

The Division requests that Geneva now finalize the permit transfer process that was initiated in 1990 for these properties. Geneva will need to fill out a new permit transfer form for the transfer of the CF&I Steel mining permit M/021/005 (copy attached). The original CF&I transfer form was incorrectly signed and notarized by Geneva for **both** the Transferor and Transferee. The appropriate corporate representative from CF&I Steel must have their signature notarized as the Transferor with Geneva as the Transferee.

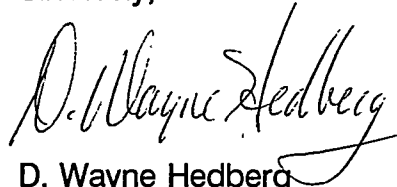
We also request that an updated disturbed area map be provided which accurately depicts the areas transferred and bonded under the transfer agreement. This information has been previously requested by letters dated October 31 and December 3, 1990 (copies attached). A detailed legal description (Appendix A) must concur with the properties outlined on the disturbed area map.

The permit transfer documents pertaining to the Ull property are adequate to complete the transfer to Geneva. However, we cannot formally release Ull from **all** of their reclamation responsibilities under permit M/021/001 and their Board Contract (self-bond), until the Board of Oil, Gas and Mining concurs with that recommendation. We will seek formal release from the Board during the December 5, 1991 hearing. Utah International and Geneva will be notified accordingly of the Board's decision following that hearing.

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If you have any questions in this regard, please contact me or Holland Shepherd directly. Thank you for your assistance in completing these permitting transactions.

Sincerely,

A handwritten signature in cursive script, reading "D. Wayne Hedberg". The signature is written in dark ink and is positioned above the printed name and title.

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb
Attachments
cc: Joseph Blais, CF&I Steel Corp.
York Jones, UII
Lowell Braxton, DOGM
Holland Shepherd, DOGM
M021001.1